

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CRYSTAL SANCHEZ, *individually and on
behalf of those similarly situated,*

Plaintiffs,

v.

SANTANDER BANK, N.A., *et al.*

Defendants.

No: 3:17-cv-05775

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS
AND COLLECTIVE SETTLEMENT AND RELATED RELIEF**

Plaintiffs, by and through undersigned counsel, hereby seek the Court enter an Order:

1. GRANTING preliminary approval of the Parties' Settlement Agreement and Release ("Settlement Agreement"), a copy of which is attached as Ex. 1-A to the Swidler Decl.;
2. GRANTING, pursuant to Fed. R. Civ. P. 23(b)(3), and for settlement purposes only, the following state law subclasses of individuals who worked for Defendant in the position of "Business Operations Manager" ("BOM"):
 - a. all individuals employed by Defendant as a BOM in New Jersey or New York anytime between June 29, 2015 and December 31, 2021;
 - b. all individuals employed by Defendant as a BOM in Massachusetts, Pennsylvania, Connecticut, or New Hampshire at any time between September 8, 2017 and December 31, 2017; and
 - c. all individuals employed by Defendant as a BOM in Rhode Island at any time from September 8, 2018 through December 31, 2021.
3. GRANTING FLSA Collective Certification for all individuals who (1) previously filed a valid consent to join the collective action lawsuit with this Court; and (2) have not previously

filed a consent to join the FLSA collective with this Court, but who are members of the Rule 23(b)(3) proposed class is certified for settlement purposes under Section 216(b) of the FLSA;

4. APPOINTING Plaintiffs Crystal Sanchez, Rabia Ahmed, Andrea Blanchard, Pearl Monteiro, Shaunsey Jackson, Michelle Romano, Joni Henderson, and Peter Sano as class representatives of the settlement classes;
5. APPOINTING Mashel Law, LLC and Swartz Swidler, LLC as Class Counsel;
6. ORDERING that Notice of Settlement is approved and shall be mailed and emailed in accordance with the procedures outlined in the Settlement Agreement to all collective and class members by no later than 30 days following the issuance of this Order;
7. ORDERING Class Counsel shall file the motion for final approval of the settlement sought in the Settlement Agreement within 90 days of the Court's Order Preliminarily Approving the Settlement;
8. SCHEDULING a Final Settlement Fairness Hearing.

Respectfully submitted,

/s/ Stephan T. Mashel

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Date: January 28, 2022